

RYAN L. DENNETT, ESQ.
Nevada Bar No. 5617
rdennett@dennettwinspear.com
DENNETT WINSPEAR, LLP
3301 N. Buffalo Drive, Suite 195
Las Vegas, Nevada 89129
Telephone: (702) 839-1100
Facsimile: (702) 839-1113
***Attorneys for Defendant, Progressive
Casualty Insurance Company***

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

ANDREA HICKS, individually, and SHEILA
HOPSON, individually,

Plaintiffs,

CASE NO. 2:24-cv-01976-GMN-DJA

vs.

PROGRESSIVE CASUALTY INSURANCE
COMPANY, a foreign corporation; and DOES I
through X, inclusive,

Defendants.

**STIPULATION AND ORDER FOR DISMISSAL OF EXTRA-CONTRACTUAL
(BAD FAITH AND PUNITIVE DAMAGES) CLAIMS, WITH PREJUDICE,
AND REMAND TO NEVADA STATE COURT**

IT IS HEREBY STIPULATED by and between ANDREA HICKS and SHEILA HOPSON,
by and through their counsel of record, BRYAN A. BOYACK, ESQ., of the BOYACK LAW
GROUP, and Defendant, PROGRESSIVE CASUALTY INSURANCE COMPANY, by and
through its counsel RYAN L. DENNETT, ESQ., of the law firm of DENNETT WINSPEAR, LLP,
that Plaintiffs' claims for extra-contractual (bad faith), punitive damages (including but not limited
to Plaintiff's Second Claim for Relief, as well as alleged breach of good faith and fair dealing, and
alleged unreasonable and wrongful conduct), and any other claims involving claims beyond any
alleged breach of contract, and/or between PROGRESSIVE DIRECT INSURANCE COMPANY,
and ANDREA HICKS and SHEILA HOPSON, are hereby dismissed, with prejudice.

...

In addition, the parties hereto also agree that this matter be remanded, by agreement, for resolution of the alleged breach of contract claim to Nevada State Court.

Further it is agreed by the parties that Plaintiffs shall amend their complaint to correct the identity of the Defendant to PROGRESSIVE DIRECT INSURANCE COMPANY.

Both sides acknowledge that each side will bear their own attorneys' fees and costs as it relates to the litigation incurred in this litigation thus far.

DATED this 8th day of November, 2024. DATED this 8th day of November, 2024.

BOYACK LAW GROUP

DENNETT WINSPEAR, LLP

By /s/ Bryan A. Boyack
 BRYAN A. BOYACK, ESQ.
 Nevada Bar No. 9980
 1707 Village Center Circle, Suite 100
 Las Vegas, Nevada 89134
 Telephone: (702) 744-7474
 Facsimile: (702) 623-4746
**Attorneys for Plaintiffs, Andrea Hicks
 And Sheila Hopson**

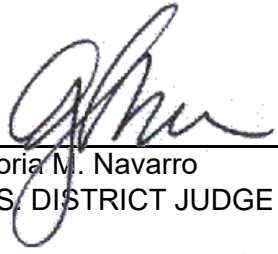
By /s/ Ryan L. Dennett
 RYAN L. DENNETT, ESQ.
 Nevada Bar No. 5617
 3301 N. Buffalo Drive, Suite 195
 Las Vegas, Nevada 89129
 Telephone: (702) 839-1100
 Facsimile: (702) 839-1113
**Attorneys for Defendant, Progressive
 Casualty Insurance Company**

ORDER

UPON STIPULATION OF COUNSEL,

IT IS SO ORDERED.

Dated: November 12, 2024.


 Gloria M. Navarro
 U.S. DISTRICT JUDGE

Theresa Amendola

From: bryan@boyacklawgroup.com
Sent: Friday, November 8, 2024 3:37 PM
To: Ryan Dennett
Cc: 65f519d3e+matter1770060679@maildrop.clio.com; Theresa Amendola; 'Adan Garcia'; 'Danny Dastrup'
Subject: RE: Hicks v. Progressive

Looks good. Please affix my electronic signature.

BRYAN A. BOYACK, ESQ.

1707 VILLAGE CENTER CIRCLE, SUITE 100
LAS VEGAS, NV 89134
BRYAN@BOYACKLAWGROUP.COM
WWW.BOYACKLAWGROUP.COM
PHONE 702-744-7474
FAX 702-623-4746



BOYACK
LAW GROUP
PERSONAL INJURY ATTORNEYS
(702) 744-7474



Confidentiality Notice: This message and any attachments are for the named person's use only. The message and any attachment may contain confidential, proprietary, or privileged information. No confidentiality or privilege is waived or lost by any mistransmission. If you receive this message in error, please immediately notify the sender, delete all copies of it from your system, and destroy any hard copies of it. Please do not, directly or indirectly, use, disclose, distribute, print, or copy any part of this message if you are not the intended recipient. Further, this message shall not be considered, nor shall it constitute an electronic transaction, non-paper transaction, and/or electronic signature under any and all electronic acts including the Uniform Electronic Transfer Act and/or the Electronic Signatures in Global and National Commerce Act.

From: Ryan Dennett <rdennett@dennettwinspear.com>
Sent: Friday, November 8, 2024 3:02 PM
To: Bryan Boyack <bryan@boyacklawgroup.com>
Cc: 65f519d3e+matter1770060679@maildrop.clio.com; Theresa Amendola <tamendola@dennettwinspear.com>; Adan Garcia <Adan@boyacklawgroup.com>; Danny Dastrup <danny@boyacklawgroup.com>
Subject: RE: Hicks v. Progressive

Bryan,

Here is a proposed stipulation for dismissal of the extracontractual claims and remand of the case back to state court. I have also included a stipulation that you be allowed to amend to add the correct Progressive entity as a defendant.

Please let me know if you are in agreement with this and if we can affix your signature for filing. Call me if you want to discuss.

Ryan

Ryan L. Dennett, Esq.